

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE

MARGARET CRAIG, as next of kin
and personal representative of
THE ESTATE OF ANGELA HULSEY,

Case No. 3:17-cv-01335

Plaintiff

JUDGE CAMPBELL/
MAGISTRATE JUDGE HOLMES

vs.

JURY DEMAND

CHEATHAM COUNTY, TENNESSEE; BEN
MOORE, MARK BRYANT, STEPHANIE
GIZZI-BELL, JESSICA PLANK,
KEITH PFEIFFER, MICHAEL
MONTGOMERY, JUSTIN PAUL, BRANDON
REASONOVER, TASHA BIGGS, HARLEY
GEROW, JOSH MARRIOTT, JEFFREY
GOAD, JUDY KING, ROGER TEMPLE,
JEFF KEY, and JAMES BARNUM,

Defendants

DEPOSITION OF:

JEREMY SHIVERS

Taken on behalf of the Defendants

Thursday, January 24, 2019

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Deposition of Jeremy Shivers

1 Ms. Hulsey's death?

2 A. Yeah.

3 Q. Who have you spoken with?

4 A. Her mother. Her brother.

5 Q. And what information do you believe that you
6 have about Ms. Hulsey's death?

7 A. She was sick. She was sick when they picked
8 her up. I made that adamantly clear to them.

9 Q. Do you --

10 A. We just left the hospital. We were on our
11 way to another hospital. They was made aware of that.

12 And she tried her best to get them to do
13 something for her the whole time I was in booking until
14 I went to the back until she died.

15 Q. When you say that she was on the way to
16 another hospital, you were still --

17 A. I stopped -- I left from one hospital, and
18 she was released from Centennial that night before. We
19 went home. I told her she had to go back to the
20 hospital. She was still sick.

21 She said, "Okay. Let me stay at home
22 tonight."

23 I did that. I stopped to pick up some money
24 on the way back to Nashville the next day, and CID
25 drew a gun on us in Pleasant View and arrested us

Deposition of Jeremy Shivers

1 didn't know what was going on with her.

2 A. Right.

3 Q. And so when you were taken to the Cheatham
4 County Jail, you were brought in together?

5 A. Yes.

6 Q. And when she was being booked in, where were
7 you?

8 A. In the cell, in Cell 4, about 6 foot away.

9 Q. Okay. And did you hear Ms. Hulsey tell the
10 intake officer any specific information about what was
11 going on with her health?

12 A. We both told them what was going on.

13 Q. But what exactly were you telling them?

14 A. It appeared that she had a stroke a couple of
15 days before, that she was drained up, that she was
16 sick, that she needed to go back to the hospital, that
17 we were on our way to the hospital.

18 They remained adamantly clear about what was
19 going on.

20 Q. Do you remember who that was that you talked
21 to?

22 A. Every officer that come through.

23 Q. And when you were taking Ms. Hulsey to the
24 hospital that morning, what were her symptoms that day?

25 A. She was -- early that morning, she was a

Deposition of Jeremy Shivers

1 little better. It seemed like she was a little better,
2 but she still was a little hazy.

3 Q. What do you mean by "hazy"? Like was she
4 incoherent or --

5 A. Yeah. A little groggy.

6 Q. Groggy. Okay.

7 Was she slow to respond if you asked her a
8 question?

9 A. Yes. Yes.

10 Q. So as far as -- other than the grogginess, at
11 the time she was being booked into the Cheatham County
12 Jail, could you describe any other symptoms that she
13 might have had at that point?

14 A. I mean no, not that I know of. She's a
15 little incoherent. She wasn't exactly answering
16 questions like she's supposed to.

17 Q. Okay, because I know you said one eye was one
18 direction; the other was --

19 A. That was straightened out. That had resolved
20 itself.

21 Q. And so once Ms. Hulsey was booked in, they
22 put her in Cell 3.

23 A. Yes.

24 Q. And did you ever see Ms. Hulsey see the nurse
25 before you moved to the back?

Deposition of Jeremy Shivers

1 before you got --

2 A. I don't have a clue. No.

3 There ain't no clocks or no windows. So
4 there's no --

5 Q. I understand.

6 So when you came in with Ms. Hulsey and you
7 were booked, were you next to her as they were asking
8 questions?

9 A. Yeah.

10 Q. Do you recall what her answers were to the
11 questions --

12 A. No. They're asking you questions while
13 they're asking her questions at the same time.

14 Q. Okay.

15 A. Focus is on me at the time.

16 Q. Do you know of anytime that Ms. Hulsey said
17 that she was okay and fine to any of the officers?

18 A. No.

19 Q. At the time that she came into the jail,
20 you've given us kind of a general description of her
21 being sick. If you can, can you be a bit more specific
22 about what you observed of her physical condition?

23 A. When we first come in, she was just real
24 weak. She was real weak. You couldn't hardly hear her
25 voice. She was a little groggy in the head. She

Deposition of Jeremy Shivers

1 wasn't answering questions like she should.

2 Q. What about her skin color? Was there any
3 difference?

4 A. She was real light. She was real pale.
5 She's mainly Indian, so it's not right for her to be
6 pale. She's real tan to begin with.

7 Q. You said you saw her one more time. You're
8 not sure exactly how many days, but you had been
9 brought up to be booked on another charge.

10 A. Mark was booking me on another charge.

11 Q. Is that Mark Bryant?

12 A. Yeah.

13 Q. And you mentioned again that she was weak,
14 couldn't get out of her bunk. What, if anything, had
15 changed from the time that you saw her last --

16 A. She just --

17 Q. -- when she was brought in to be booked?

18 A. -- appeared a little worse, if anything.

19 Q. What specifically was worse?

20 A. Well, she couldn't get up and come to the
21 bars like she would have done normally. Skin was real,
22 real discolored. Voice was real weak.

23 I asked if she's all right.

24 She said, "No, I'm not."

25 I said, "Are they not doing anything for